

SEALED

FILED 21 APR '21 15:36 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:21-cr- 139-HZ

v.

INDICTMENT

JULIAN RAY NEVAREZ,

18 U.S.C. § 875(c)

Defendant.

UNDER SEAL

THE GRAND JURY CHARGES:

**COUNT 1
(Threatening Interstate Communication)
(18 U.S.C. § 875(c))**

On or about February 18, 2021, in the District of Oregon, defendant **JULIAN RAY NEVAREZ**, knowingly did transmit in interstate and foreign commerce a communication from within the State of Idaho, to the State of Oregon, by making a phone call to Adult Victim 1 (AV-1), an employee at Lincoln High School in Portland Oregon, and the communication contained a threat to kill and injure occupants of Lincoln High School;

In violation of Title 18, United States Code, Section 875(c).

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Indictment

COUNT 2
(Threatening Interstate Communication)
(18 U.S.C. § 875(c))

On or about March 1, 2021, in the District of Oregon, defendant **JULIAN RAY NEVAREZ**, knowingly did transmit in interstate and foreign commerce a communication from within the State of Idaho, to the State of Oregon, by making a phone call to Adult Victim 2 (AV-2), a Portland Police Bureau Officer who had been investigating a bomb threat made to Lincoln High School in Portland Oregon, and the communication contained a threat to injure and kill AV-2's family members;

In violation of Title 18, United States Code, Section 875(c).

Dated: April 21, 2021

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

SCOTT ERIK ASPHAUG
Acting United States Attorney


PETER D. SAX
Assistant United States Attorney